

### **REMARKS/ARGUMENTS**

This Amendment is in response to the Office Action mailed October 11, 2006. In the Office Action, claims 19 and 21-23 are allowed. Claims 1-2, 11-12, 15, 18, 25-26 and 32-33 are rejected under 35 U.S.C. §102(e). Claims 3 and 16 are rejected under 35 U.S.C. §103(a). Reconsideration in light of the amendments and remarks made herein is respectfully requested.

#### ***Claim Objections***

Claim 20 was objected to because the status indicator was incorrect. Applicants respectfully request that the Examiner withdraw the objection to claim 20.

#### ***Rejection Under 35 U.S.C. § 102***

Claims 1, 2, 11, 12, 15, 18, 25, 26, 32 and 33 were rejected under 35 U.S.C. § 102(e) as being anticipated by Elkayam (U.S. Patent Application No. 2003/0099076 A1). Applicants respectfully submit that a *prima facie* case of anticipation cannot be established.

As the Examiner is aware, to anticipate a claim, the reference must teach every element of the claim. "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Vergegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ 2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the...claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ 2d 1913, 1920 (Fed. Cir. 1989).

For instance, with respect to independent claims 1, 15 and 25, Elkayam does not describe the claimed elements of a connection module, which is now explicitly identified as a component mounted to a circuit board. In accordance with the specification, the "connector module" is a component mounted to a circuit board. *See paragraph [0057] of the subject application*. In contrast, Elkayam is directed to a daughter card/motherboard implementation and does not describe the "connector module" implementation as claimed.

In summary, the connection module as claimed should not be construed as the circuit boards themselves, and thus, Applicant respectfully requests that the Examiner withdraw the rejection of independent claims 1, 15 and 25 as well as those claims dependent thereon. Withdrawal of the outstanding §102(e) rejection is respectfully requested.

Claims 25, 32 and 33 were rejected under 35 U.S.C. § 102(b) as being anticipated by Mouton (U.S. Patent Application No. 2002/0002672 A1). Applicants respectfully submit that a *prima facie* case of anticipation cannot be established because the "connector module" has been broadly construed as a concentrator (WCH1). Applicants have amended claim 25 to identify that the connector module is a component mounted to a circuit board that is implemented within a switching device.

Withdrawal of the outstanding §102(e) rejection is respectfully requested, and upon allowance, Applicants respectfully request the ability to amend claims 29-31 and 34 to reflect a claim structure directed to the switching device.

***Rejection Under 35 U.S.C. § 103***

Claim 3 was rejected under 35 U.S.C. §103(a) as being unpatentable over Elkayam in view of Binder (U.S. Patent Application No. 2005/0047431). While Applicants disagree with the rejection based on the claimed subject matter, further discussion of the grounds for rejection are moot based on the allowability of claim 1. Applicants reserve the right to present additional arguments if this claim is still not found to be in condition for allowance.

Claim 16 was also rejected under 35 U.S.C. §103(a) as being unpatentable over Elkayam in view of Pannell (U.S. Patent No. 6,977,507). While Applicants disagree with the rejection based on the claimed subject matter, further discussion of the grounds for rejection are moot based on the allowability of claim 15. Applicants reserve the right to present additional arguments if this claim is still not found to be in condition for allowance.

**Conclusion**

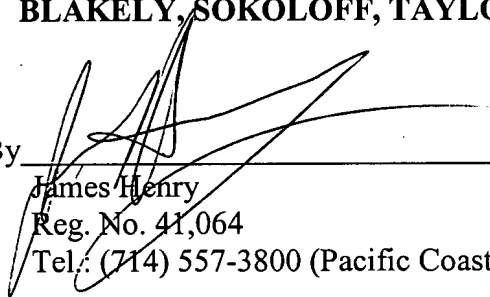
Applicants respectfully request that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

**BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP**

Dated: April 10, 2007

By

  
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